

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

ARMAND SANCHEZ,

Plaintiff,

v.

DEPUY ORTHOPAEDICS, INC.; DEPUY,  
INC.; DEPUY INTERNATIONAL LIMITED;  
DEPUY PRODUCTS, INC.; JOHNSON &  
JOHNSON; JOHNSON & JOHNSON  
SERVICES, INC.; and JOHNSON &  
JOHNSON INTERNATIONAL

Defendants.

MDL No. 3:11-md-02244-K

Case No. 3:12-CV-0419

Honorable Ed Kinkeade

**STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1), it is hereby stipulated and agreed that Plaintiff ARMAND SANCHEZ dismisses all claims asserted in this litigation against Defendants, DEPUY ORTHOPAEDICS, INC., n/k/a MEDICAL DEVICE BUSINESS SERVICES, INC.; DEPUY INC., n/k/a DEPUY SYNTHES, INC.; DEPUY INTERNATIONAL LIMITED; JOHNSON & JOHNSON; JOHNSON & JOHNSON SERVICES, INC., and JOHNSON & JOHNSON INTERNATIONAL, without prejudice, with each party to bear its own costs and fees.

The parties further agree that if Plaintiff, Plaintiff's estate, or anyone acting on Plaintiff's behalf re-files a lawsuit asserting the same or similar claims, they will do so in either MDL 2244,

*In re DePuy Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation*, or in another United States District Court where venue is proper.

**BARNES & THORNBURG LLP**

*/s/ Terri L. Bruksch*

By: \_\_\_\_\_  
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***Counsel for Defendants***  
Dated: 3/9/2020

**MCCUNE WRIGHT AREVALO, LLP**

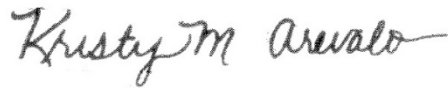


By: \_\_\_\_\_  
**Kristy M. Arevalo**  
**McCune Wright Arevalo, LLP**  
**3281 East Guasti Rd., Suite 100**  
**Ontario, CA 91761**  
**(909) 557-1250**  
**kma@mccunewright.com**  
***Counsel for Plaintiff***  
Dated: 3/9/2020

**CERTIFICATE OF CONFERENCE**

I hereby certify that on March 9, 2020, counsel for Plaintiff electronically conferred with Counsel for Defendants DePuy Orthopaedics, Inc; DePuy Inc.; DePuy International Limited; DePuy Products, Inc.; Johnson & Johnson; Johnson & Johnson Services; and Johnson & Johnson International. The parties are in agreement with the proposed stipulated dismissal.

**MCCUNE WRIGHT AREVALO, LLP**



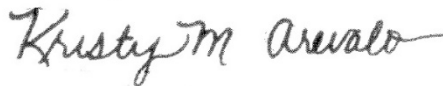
By: \_\_\_\_\_  
**Counsel for Plaintiff**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties that are CM/ECF participants in this action.

DATED this 9<sup>th</sup> day of March, 2020.

**MCCUNE WRIGHT AREVALO, LLP**



By: \_\_\_\_\_  
**Counsel for Plaintiff**